

EXHIBIT

B

PRODUCT APPENDIX

ZONOLITE PRODUCTS WHICH CONTAINED COMMERCIAL ASBESTOS

1. a, n. **Econo-White 65 and Econo-White 70 (a/k/a Econo-White Acoustical Texture and Econo-White Super White).**
 - b. Produced by the Zonolite Company from 1956 to 1963. First produced by Grace in 1963.
 - c, d. Approximately 1970.
 - e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are also listed, where known:
 - (1) North Little Rock, Arkansas; 1956-1968;
 - (2) Sacramento, California;
 - (3) Denver, Colorado;
 - (4) Dearborn, Michigan;
 - (5) Omaha, Nebraska;
 - (6) Trenton, New Jersey;
 - (7) Albany, New York;
 - (8) Ellwood City, Pennsylvania; made for a two-year period, late 1950's or early 1960's;
 - (9) Travelers Rest, South Carolina;
 - (10) Kearney, South Carolina;
 - (11) Dallas, Texas;
 - g, j. Chemical Composition: Perlite Bentonite (montmorillonite type), Short-fiber chrysotile asbestos, Titanium Dioxide, Sodium Lauryl Sulfate. Approximately 13-17 percent 7M asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.
- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.

- l. Econo-White 65 and Econo-White 70 were white acoustical plasters for walls and ceilings.
 - m. Fireproofing and acoustical plastic product were packaged in multi-walled, pasted-valve bags constructed of two 60 pound piles of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
2. a, n. **Zono-Coustic.** a/k/a Zono-Coustic 1 and Zono-Coustic 2, Zono-Coustic 3, Zono-Coustic Type Z, and Zono-Coustic (MK-2).
- b. Produced by the Zonolite Company from approximately 1960 to 1963. First produced by Grace in 1963.
 - c, d. Approximately 1973.
 - e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are also listed, where known:
 - (1) North Little Rock, Arkansas; 1961-1962;
 - (2) Los Angeles, California;
 - (3) Newark, California; 1970-1973;
 - (4) Sacramento, California;
 - (5) Wilder, Kentucky;
 - (6) Dearborn, Michigan;
 - (7) St. Louis, Missouri;
 - (8) Omaha, Nebraska;
 - (9) Trenton, New Jersey;
 - (10) Albany, New York;
 - (11) Portland, Oregon; 1959 and 1960's;
 - (12) Ellwood City, Pennsylvania;
 - (13) Travelers Rest, South Carolina, 1959-1963;
 - (14) Kearney, South Carolina;
 - (15) Dallas, Texas;
 - (16) Spokane, Washington; 1959-1962;
 - g. Chemical Composition: (Zono-Coustic 1): Vermiculite, Short-fiber chrysolite asbestos, Plaster of Paris, approximately 11-14 percent 7M asbestos by weight. (Zono-Coustic 2): Vermiculite, Plaster of Paris, Short-fiber chrysolite asbestos, approximately 10-13 percent 7M asbestos by weight,

White Portland Cement, ZOD Concentrate; (Zono-Coustic 3): Vermiculite, Plaster of Paris, Short-fiber chrysolite asbestos, Hydrated Lime, Titanium Dioxide, Sodium Lauryl Sulfate, approximately 11-14 percent 7M asbestos by weight; (Zono-Coustic Type Z): Vermiculite, Plaster of Paris, Short-fiber chrysolite asbestos, Portland Cement, Sodium Lauryl Sulfate, approximately 11-14 percent 7M asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of the commercial asbestos: John-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Company, John K. Bice Company, A.J. Lynch Company, Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corporation Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. Zono-Coustic was an off-white acoustical plaster.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it held manufacturing rights under patent no. 3,042,681, patented July 3, 1962 and registered through the U.S. Patent Office.
3. a, n. **Zonolite Acoustical Plastic/Plaster.** Acoustical Plaster was also marketed in a variation called Zonolite Acoustical Plastic. Two Types of Zonolite Acoustical Plastic - Standard and Bermuda Tan - were manufactured and sold. These products were also marketed as Vermiculite Acoustical Plaster may also have been manufactured in Standard Hardness and Extra Hard. Acoustical plaster with additional whitening agent was marketed in California under the trade names Super White and Oyster White.
- b. Produced by the Zonolite Company from 1945 until 1963. First produced by Grace in 1963.
 - c, d. Approximately 1972.

- e, f. Zonolite Company (1945 until 1963); of the plants listed below. Approximate dates of production are also listed, where known:

- (1) Birmingham, Alabama;
- (2) Phoenix or Glendale, Arizona: 1959-early 1970's;
- (3) North Little Rock, Arkansas; 1951-mid 1960's
- (4) Los Angeles, California;
- (5) Sacramento, California;
- (6) Denver, Colorado; 1952 - 1959
- (7) Tampa, Florida; 1950's-1967
- (8) Easthampton, Massachusetts;
- (9) North Billerica, Massachusetts;
- (10) Dearborn, Michigan;
- (11) Minneapolis, Minnesota; 1949-1962
- (12) St. Louis, Missouri;
- (13) Omaha, Nebraska; 1962-1970
- (14) Trenton, New Jersey; 1964;
- (15) Albany, New York;
- (16) Portland, Oregon;
- (17) Ellwood City, Pennsylvania; 1948-1960
- (18) Travelers Rest, South Carolina; 1948-1960
- (19) Kearney, South Carolina;
- (20) Dallas, Texas; 1973
- (21) Spokane, Washington; 1945-early 1970's;
- (22) Milwaukee, Wisconsin; from date unknown until 1971

- g, j. Chemical Composition: (Standard): Vermiculite, Bentonite (montmorillonite type), Short-fiber chrysotile 7M asbestos (15-19% by weight), Sodium Lauryl Sulfate. (Bermuda Tan): Vermiculite, Bentonite (montmorillonite type), Short-fiber chrysotile 7M asbestos (16-20% by weight), Sodium Lauryl Sulfate, Dowicide, Sodium Nitrate. Acoustical Plaster may also have been manufactured in the 1950's with 6D or 7D asbestos.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.

- l. The product was a light beige acoustical plaster.
 - m. Fireproofing and acoustical plastic products were packages in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
4. a, n. **Zonolite Finish Coat (Decorator's White).** May have been marketed simply as Zonolite Acoustical Finish Coat or Decorator's White, or as Zonolite Acoustical Finish. A variation called Zonolite Finish Coat Decorator's White Extra Hard was produced from 1961 to 1973. A product called Zonolite Finish Coat (Decorator's White), which did not contain commercial asbestos, was marketed in 1973 and 1974.
- b. Produced by the Zonolite Company from 1950 to 1963. First produced by Grace in 1963.
 - c, d. Believed to be 1973.
 - e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are also listed, where known:
 - (1) Los Angeles, California;
 - (2) Sacramento, California;
 - (3) Denver, Colorado; 1952-1965;
 - (4) Pompano Beach, Florida; 1971-1973;
 - (5) Wilder, Kentucky;
 - (6) Easthampton, Massachusetts;
 - (7) Dearborn, Michigan;
 - (8) Trenton, New Jersey;
 - (9) Albany, New York;
 - (10) Portland, Oregon;
 - (11) Travelers Rest, South Carolina;
 - (12) Dallas, Texas;
 - (13) Spokane, Washington;
 - g, j. Chemical Composition: Vermiculite, Bentonite (montmorillonite type), Short-fiber chrysotile asbestos, Titanium Dioxide, Sodium Lauryl Sulfate. Approximately 11-14 percent 7M asbestos by weight for standard and extra hard.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. Zonolite Finish Coat was a white decorative-textured finish for ceilings.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
5. a, n. **Zonolite Spra-Tex.** A variety of Spra-Tex, called Zonolite Spra-Tex EH (Extra Hard) was produced from approximately 1961 until 1972.
- b. Produced by the Zonolite Company from approximately 1955 to 1963. First produced by Grace in 1963.
 - c, d. Approximately 1972.
 - e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are also listed, where known:
 - (1) North Little Rock, Arkansas; may have been made after 1961;
 - (2) Los Angeles, California;
 - (3) Sacramento, California;
 - (4) Pompano Beach, Florida;
 - (5) Wilder, Kentucky;
 - (6) New Orleans, Louisiana;
 - (7) Omaha, Nebraska;
 - (8) Trenton, New Jersey;
 - (9) Albany, New York;

- (10) Ellwood City, Pennsylvania; 1957-1963;
- (11) Travelers Rest, South Carolina; 1959-1963;
- (12) Kearney, South Carolina;
- (13) Spokane, Washington.

g, j. Chemical Composition: (Regular) Kaolin Clay, Short-fiber chrysotile asbestos, Titanium Dioxide, Vermiculite, Sodium Lauryl Sulfate. Approximately 30-36 percent 7M asbestos by weight. (Extra Hard) Kaolin Clay, Short-fiber chrysotile asbestos, Vermiculite, Titanium Dioxide, ZOD Concentrate, Sodium Lauryl Sulfate. Approximately 29-35% 7M asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. Zonolite Spra-Tex was a white decorative ceiling finish.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
6. a, n. **Z-Tex, may also be marketed as EZ-Tex.**
- b. First produced by the Zonolite Company about 1958.
 - c, d. Approximately 1962.
 - e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are not known:

- (1) North Little Rock, Arkansas;
- (2) Sacramento, California;
- (3) Pompano Beach, Florida;
- (4) Wilder, Kentucky;
- (5) St. Louis, Missouri;
- (6) Trenton, New Jersey;
- (7) Albany, New York;
- (8) Travelers Rest, South Carolina.

- g, j. Chemical Composition: Plaster of Paris, Vermiculite, Short fiber chrysotile asbestos, White Cement, ZOD Concentrate, Retarder, Dowicide; Approximately 13-17 percent asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
- l. Z-Tex was a white or beige spray-texture product.
- m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it held manufacturing rights under patent no. 3,042,681, patented July 3, 1962 and registered through the U.S. Patent Office.
7. a, n. **Zonolite Board Of Education Texture and Hard Texture.**
- b. Produced by Zonolite Company for one job site in 1962 or 1963.
- c, d. Produced by Zonolite Company for one job site in 1962 or 1963.
- e, f. Manufactured at the Zonolite plant in Blue Island, Illinois, in 1962 or 1963.

- g, j. Chemical Composition: Hard Texture: Perlite, Bentonite (Montmorillonite type), Titanium Dioxide, Short-fiber Chrysotile Asbestos, North Carolina Clay, ZOD Concentrate, Calcium Carbonate, Sodium Lauryl Sulfate, Fungicide. Texture: Perlite, Bentonite (montmorillonite type), Titanium Dioxide, Short-fiber Chrysotile Asbestos, North Carolina Clay, Calcium Carbonate, Sodium Lauryl Sulfate, Fungicide. Approximately 9-12 percent 7M asbestos by weight in standard texture and hard texture.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Unknown.
- l. Very white texture and hard texture coats.
- m. Packaging unknown.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
8. a, n. **Perltex Super-40 Fog (a/k/a Perltex Fog).** A product called Perltex Super-40 Fog, which did not contain commercial asbestos, was marketed from 1973 to approximately 1975.
- b. Originally produced by the Western Mineral Products Co. Grace first manufactured the product when Western Mineral Products merged into Grace in 1966.
- c, d. Believed to be 1973.
- e, f. Manufactured at one or both of the plants listed below. Approximate dates of production are also listed:
- (1) Pompano Beach, Florida; 1971-1973;
- (2) Omaha, Nebraska; before 1972.
- g, j. Chemical Composition: Whiting, Talc, Short-fiber chrysotile asbestos, Asbestos approximately (4-7%) by weight, Staramic, Titanium Dioxide, Dowicil, Methocel, NTA, Daxad-17, Ultramarine Blue. Approximately 4-7% asbestos by weight. In two formula documents, one undated and one dated March 14, 1972, Talc, Titanium Dioxide, Daxad 17 and Ultramarine Blue

were eliminated from the above formula and replaced with lithopone, casein, TSP and sodium nitrite.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. The product was a white or beige base coat used under paint or a texture product.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
9. a, n. **Perltex Super-40 Perlite (a/k/a Perltex Perlite or Super-40 Perlite).** A product called Perltex Super-40 Perlite, which did not contain commercial asbestos, was marketed in 1973 and 1974.
- b. Originally produced by the Western Mineral Products Co. Grace first manufactured the product after Western Mineral Products merged into Grace in 1966.
 - c, d. Believed to be 1973.
 - e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are also listed, where known:
 - (1) Pompano Beach, Florida; 1972-1973;
 - (2) Omaha, Nebraska; mid-1960's-1973;
 - (3) Dallas, Texas.

- g, j. Chemical Composition: Whiting, Perlite Aggregate, Short-fiber chrysotile asbestos, Lithopone, Staramic, Casein, Methocel, Trisodium Phosphate, Dowicil, Sodium Nitrate, NTA. Approximately 6-8% asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
- l. The product was a white or beige textured finish.
- m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
10. a, n. **Perltex Super-40 Polycoarse (a/k/a Perltex Polycoarse, Perltex Super-40 Poly or Perltex Poly).** A product called Perltex Super-40 Polycoarse, which did not contain commercial asbestos, was marketed from 1973 to approximately 1975.
- b. Originally produced by the Western Mineral Products Co. Grace first manufactured the product after Western Mineral Products merged into Grace in 1966.
- c, d. Believed to be 1973.
- e, f. Manufactured at one or both of the plants listed below. Approximate dates of production are also listed.
- (1) Pompano Beach, Florida; 1972-1973;
- (2) Omaha, Nebraska; mid-1960's-1973.

- g, j. Chemical Composition: Whiting, Talc, Short-fiber chrysotile asbestos, Staramic, Lithopone, Methocel, Polystyrene Aggregate, NTA, Dowicil, Daxad-17, Ultramarine Blue. Approximately 4-6 percent asbestos by weight.

Two formula documents, one undated and the other dated March 14, 1972, set forth the following formula for Super 40 Poly: Whiting, Talc, Asbestos (1-2%), Lithopone, Methocel, Poly Beads, NTA, Dowicil, Casein, TSP, Kalloid Clay, Natrosol.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
- l. This was a white or beige texture product.
- m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
11. a, n. **Perltex Super-40 SAV. (a/k/a Perltex SAV, or Super-40 SAV).** A product called Perltex Super-40 SAV, which did not contain commercial asbestos, was marketed in 1973 and 1974.
- b. Originally produced by the Western Mineral Products Co. Grace first manufactured the product after Western Mineral Products merged into Grace in 1966.
- c, d. Believed to be 1973.
- e, f. Manufactured at one or both of the plants below. Approximate dates of production are also listed.

- (1) Pompano Beach, Florida; 1971-1973;
- (2) Omaha, Nebraska, mid-1960's-1972.

g, j. Chemical Composition: Whiting, SAV Aggregate, Lithopone, Short-fiber chrysotile asbestos, Staramic, Casein, Trisodium Phosphate, Methocel, NTA, Sodium Nitrate, Dowicil. Approximately 5-7 percent asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.

l. The product was a white or beige textured finish.

m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.

o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.

12. a, n. **Perltex Spray Surfacers (a/k/a Plaster Tex, Perltex Super-40 Spray Surfacers, Perltex Super-40, and Gun Coat Spray Surfacers).**

b. Originally produced by the Western Mineral Products Co. Grace first manufactured the product when Western Mineral Products merged into Grace in 1966.

c, d. Approximately 1973.

e, f. This product was manufactured at one or both of the plants listed below. Approximate dates of manufacture are also listed:

- (1) Pompano Beach, Florida; 1971-1973;

(2) Omaha, Nebraska; before 1972.

- g, j. Chemical Composition: Whiting, Sodium Nitrate, Lithopone, Casein, Mica XX, Pryprophyllite, Soya Flour, Short-fiber chrysotile asbestos, Kalloid Clay, Tri-Sodium Phosphate, KA 47 Titanium, Mica AA, Snow Flake Lime, Dowicide G, Calcium Sterate, Perlite. Approximately 6-11 percent 7TF1 or 7RF9 asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
- l. Product was a white texture product, applied over board, concrete, metal or plaster.
- m. This product was packaged in multi-walled, pasted valve bags constructed of two 60-pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight classification 100-1.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
13. a, n. **Versakote (Prep Coat #4).** May also have been marketed as Perltext Versakote or Prep-Coat #4. A product called Versakote, which did not contain commercial asbestos, began to be marketed in 1973.
- b. Originally produced by the Western Mineral Products Co. Grace first manufactured the product after Western Mineral Products merged into Grace in 1966.
- c, d. Approximately 1973.
- e, f. Manufactured at one or both of the plants listed below. Approximate dates of production are also listed:

- (1) Pompano Beach, Florida; 1972-1973;
- (2) Omaha, Nebraska; mid-1960's-1972.

g, j. Chemical Composition: White Portland Cement, Whiting, Hydrated Lime, Perlite Aggregate, Short-fiber chrysotile asbestos, Titanium Dioxide, Aluminum Hydrate, Aluminum Stearate, Gelvatol, Hamaco, Daxad 17, Darex Set Accel., Nopco PD-1, Dowicil. Approximately 5-7 percent asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.

l. The product was a white or beige textured finish.

m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.

o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.

14. a, n. **Spra-Wyt (a/k/a Spray-Wyt Finish, Spray-Wyt Acoustical, or Spray-Wyt Acoustical Finish).**

b. Originally produced by the Western Mineral Products Co. as early as 1954. Grace first manufactured the product after Western Mineral Products merged into Grace in 1966.

c, d. Believed to be 1973.

e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are not known.

- (1) Denver, Colorado;
- (2) Minneapolis, Minnesota;
- (3) Milwaukee, Wisconsin;
- (4) Trenton, New Jersey;
- (5) Omaha, Nebraska.

- g, j. Chemical Composition: Perlite, Bentonite (montmorillonite type), Short-fiber chrysotile asbestos, Titanox RA-50, Double Hydrate Lime, Duponol WA Dry, Dowicide "6". Approximately 16-20 percent 7M asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
- l. Acoustical plaster.
- m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
15. a, n. **Hi-Sorb Acoustical Plaster.** Sold in Oyster White and XX White as well as color varieties.
- b. Originally produced by Western Mineral Products Co. Grace first manufactured the product after Western Mineral Products merged into Grace in 1966.
- c, d. Although most sales ended prior to Western Mineral Products' merger with Grace, Grace's records indicate that sales of small quantities of the product continued until early 1973.

e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are not known.

- (1) Denver, Colorado;
- (2) Minneapolis, Minnesota;
- (3) Milwaukee, Wisconsin;
- (4) Trenton, New Jersey;
- (5) Omaha, Nebraska.

g, j. Chemical Composition: (XX White Hi-Sorb): South African Vermiculite, Perlite, Plaster of Paris, Believed to be short-fiber chrysotile asbestos, Bentonite, Cal. Concentrate, Titanium, Drywall Additive, approximately 8-10 percent 7M asbestos by weight. (Oyster white HiSorb): South African Vermiculite, Vermiculite, Plaster of Paris, Believed to be short-fiber chrysotile asbestos, Bentonite, Cal. Concentrate, Drywall Additive. Approximately 8-10 percent 7M asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
- l. Acoustical textured ceiling plaster.
- m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.

16. a, n. **Ari-Zonolite Board Texture.**

b. Produced by the Ari-Zonolite Co. for a two or three year period in the early 1960's.

c, d. Approximately 1964.

e, f. The Phoenix, Arizona plant for two to three years in the early 1960's.

g, j. Chemical Composition: Grace believes the product contained approximately 10% commercial asbestos, but has no formula documents. The investigation is continuing.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

k. Globe Asbestos.

l. Off-white, cementitious ceiling material.

m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.

o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.

17. a, n. **Perl-Coustic.**

b. Originally produced by the Western Mineral Products Co. Grace first manufactured the product after Western Mineral Products merged into Grace in 1966.

c, d. Unknown. Investigation continues.

e, f. Omaha, Nebraska; Milwaukee, Wisconsin.

g, j. Chemical Composition: Perlite, Chrysotile asbestos, Solka-Floc BW-20, Bentonite, Sodium Nitrite, Dowicide G, Naconal DB Beads. Approximately 15-17 percent 7M asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. Acoustical Plaster.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
18. a, n. **Prep-Coat #3.** This product may also have been manufactured without commercial asbestos. Investigation continues.
- b. Originally produced by the Western Mineral Products Co. Grace first manufactured the product after Western Mineral Products merged into Grace in 1966.
 - c, d. Approximately 1972.
 - e, f. Omaha, Nebraska.
 - g, j. Chemical Composition: White Cement, Chrysotile asbestos, Calcium Carbonate, Vermiculite, Finish Lime Double Hydrated, Perlite. Approximately 4-5 percent asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial

asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.

- l. Investigation continues.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
19. a, n. **Zonolite High Temperature Cement (Also marketed as Zonolite Hi-Temperature Cement and Zonolite High Temperature Insulating Cement).**
- b. Produced by the Zonolite Company from approximately 1938 to 1963. First produced by Grace in 1963.
 - c, d. Approximately 1970 or 1971.
 - e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are also listed, where known:
 - (1) North Little Rock, Arkansas: 1967-?;
 - (2) Santa Ana, California;
 - (3) Atlanta, Georgia: 1952(?)-?;
 - (4) Chicago, Illinois: 1966(?)-1970(?);
 - (5) Wilder, Kentucky;
 - (6) St. Louis, Missouri;
 - (7) Trenton, New Jersey;
 - (8) Albany, New York;
 - (9) High Point, North Carolina: 1951(?)-1970(?);
 - (10) New Castle, Pennsylvania: ?-1970;
 - (11) Travelers Rest, South Carolina.
 - g. Chemical Composition: Vermiculite, Bentonite (montmorillonite type), Short-fiber chrysotile asbestos, Orvus Neutral Granule. Approximately 15-19 percent 7D or 6D-20 percent asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. Zonolite High-Temperature Cement was a light beige cementitious material.
 - m. Sold in insulating plastic bags or 25 lb. paper bags.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that its investigation to date has revealed no information which is responsive to this interrogatory.
20. a, n. **Zonolite Mono-Kote (MK-1).** At times sold under the generic name Mono-Kote.
- b. Produced by the Zonolite Company from 1958 until the early 1960's.
 - c, d. Believed to be 1962.
 - e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are not known:
 - (1) Phoenix, Arizona;
 - (2) Los Angeles, California;
 - (3) Sacramento, California;
 - (4) Denver, Colorado;
 - (5) Tampa, Florida;
 - (6) Wilder, Kentucky;
 - (7) New Orleans, Louisiana;
 - (8) Dearborn, Michigan;
 - (9) Minneapolis, Minnesota;
 - (10) Omaha, Nebraska;
 - (11) Trenton, New Jersey;
 - (12) Albany, New York;
 - (13) Portland, Oregon;

- (14) Travelers Rest, South Carolina;
- (15) Dallas, Texas;
- (16) Spokane, Washington.

g, j. Chemical Composition: Vermiculite, Plaster of Paris, Chrysotile asbestos, Portland Cement, ZOD Concentrate. Approximately 10-13 percent asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. Mono-Kote fireproofing (MK-1) was a light-beige, cementitious fireproofing material.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it held manufacturing rights under patent no. 3,042,681, patented July 3, 1962 and registered through the U.S. Patent Office.
21. a, n. **Zonolite Spra-Insulation (MK-2).** (a/k/a Spra-Insulation or MK-2).
- b. Produced by the Zonolite Company from approximately 1961 to 1963. First produced by Grace in 1963.
 - c, d. Approximately 1973.
 - e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are also listed, where known:
 - (1) Sacramento, California;
 - (2) Denver, Colorado;

- (3) Wilder, Kentucky;
- (4) Muirkirk, Maryland;
- (5) Minneapolis, Minnesota;
- (6) Omaha, Nebraska;
- (7) Trenton, New Jersey;
- (8) Weedsport, New York;
- (9) North Little Rock, Arkansas; a small amount may have been made at this plant some time after 1961;
- (10) Portland, Oregon;
- (11) Travelers Rest, South Carolina; a small amount may have been made at this plant some time after 1960;
- (12) Dallas, Texas;
- (13) Spokane, Washington;
- (14) Milwaukee, Wisconsin; discontinued about 1967;
- (15) Los Angeles, California.

- g, j. Chemical Composition: Vermiculite, Plaster of Paris, Short-fiber chrysotile asbestos, Portland Cement, ZOD Concentrate. Approximately 10-13 percent 7M asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
- l. Zonolite Spra-Insulation (MK-2) was a dark beige cementitious material.
- m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it held manufacturing rights under patent no. 3,042,681, patented July 3, 1962 and registered through the U.S. Patent Office.

22. a, n. **Zonolite Mono-Kote MK-3.** At times sold as Mono-Kote III or Mono-Kote MK-3.
- b. Produced by the Zonolite Company from 1961 to 1963. First produced by Grace in 1963.
- c, d. Approximately 1973.
- e, f. Manufactured at some or all of the plants listed below. Approximate dates of production are also listed, where known:
- (1) Phoenix (Glendale), Arizona; 1961-1973;
 - (2) North Little Rock, Arkansas; 1961-1973;
 - (3) Los Angeles, California; 1961-1973;
 - (4) Newark, California; 1965-1973;
 - (5) Sacramento, California;
 - (6) Santa Ana, California; 1972-1973;
 - (7) Denver Colorado; 1961-1973;
 - (8) Jacksonville, Florida; 1968-1973;
 - (9) Tampa, Florida; 1961-1967;
 - (10) Chicago (W. Chicago), Illinois; 1961-1973;
 - (11) Wilder, Kentucky;
 - (12) New Orleans, Louisiana; produced some MK-3 for a short period in the early 1960's;
 - (13) Muirkirk, Maryland;
 - (14) Easthampton, Massachusetts; 1964-1973;
 - (15) Dearborn, Michigan;
 - (16) Minneapolis, Minnesota; 1961-1972;
 - (17) St. Louis, Missouri; 1961-1973;
 - (18) Omaha, Nebraska; 1962-1973;
 - (19) Trenton, New Jersey; MK-3 was being made in 1964;
 - (20) Albany, New York;
 - (21) Weedsport, New York; 1965-1973;
 - (22) Portland, Oregon; 1963-1973;
 - (23) Ellwood City, Pennsylvania; produced some MK-3 in the mid-1960's;
 - (24) New Castle, Pennsylvania; 1969-1973;
 - (25) Travelers Rest, South Carolina; 1961-1965;
 - (26) Kearney, South Carolina; 1966 or 1967-1973;
 - (27) Dallas, Texas;
 - (28) Spokane, Washington; 1961-1973;
 - (29) Milwaukee, Wisconsin;
- g, j. Chemical Composition: Plaster of Paris, Vermiculite, Chrysotile asbestos, Sodium Lauryl Sulfate. Approximately 10-14 percent 7M asbestos or 7R asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. MK-3 was a light beige cementitious material.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it held manufacturing rights under patent no. 3,369,929, issued February 20, 1968 and registered through the U.S. Patent Office.
23. a, n. **Prep Coat #5.**
- b. Unknown. Investigation continues.
 - c, d. Unknown. Investigation continues.
 - e, f. Manufactured at one or both of the plants listed below. Dates of production are also listed to the extent known:
 - (1) Pompano Beach, Florida: 1973;
 - (2) Omaha, Nebraska: 1970-1972.
 - g, j. Chemical Composition: White Portland Cement, Whiting, Hydrated Lime, 7 RF 9 chrysotile asbestos, Vermiculite, Perlite Aggregate. Approximately 5-7 percent asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. The product was a white textured finish.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it has been conducting an investigation and document review for some time, which is continuing. Thus far, no information has been obtained which is responsive to this interrogatory.
24. a, n. **Satin White.**
- b. Unknown. Investigation continues.
 - c, d. Unknown. Investigation continues.
 - e, f. Manufactured by California Zonolite Co. at the plants listed below. Dates of production are also listed to the extent known:
 - (1) Sacramento, California: 1964;
 - (2) Los Angeles, California: 1964.
 - g, j. Chemical Composition: Vermiculite, Bentonite, 7M chrysotile asbestos, Whiting, Titanium Dioxide, Satin White Concentrate, MBS 40. Approximately 13-17 percent asbestos by weight.
- Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.
- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch &

Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.

- l. The product was a white decorative textured finish for ceilings.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it has been conducting an investigation and document review for some time, which is continuing. Thus far, no information has been obtained which is responsive to this interrogatory.
25. a, n. **Ari-Zonolite Natural.**
- b. Unknown. Investigation continues.
 - c, d. Unknown. Investigation continues.
 - e, f. Produced by the Ari-Zonolite Co. at its Phoenix, Arizona plant at least in 1964.
 - g, j. Chemical Composition: Vermiculite, 7M chrysotile asbestos, Bentonite, Duponol, Sodium Nitrate, Plaster of Paris. Approximately 15-19 percent asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
- l. The product was an acoustical plaster.

- m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it has been conducting an investigation and document review for some time, which is continuing. Thus far, no information has been obtained which is responsive to this interrogatory.
26. a, n. **Ari-Zonolite Oyster White.**
- b. Unknown. Investigation continues.
 - c, d. Unknown. Investigation continues.
 - e, f. Produced by the Ari-Zonolite Co. at its Phoenix, Arizona plant at least in 1964.
 - g, j. Chemical Composition: Vermiculite, Chrysotile asbestos, Bentonite, Duponol, Titanium, Perlite, Approximately 28-32 percent asbestos by weight.
- Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.
- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. The product was a white decorative textured finish for ceilings.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection,

Grace states that it has been conducting an investigation and document review for some time, which is continuing. Thus far, no information has been obtained which is responsive to this interrogatory.

27. a, n. **Ari-Zonolite Nu-White.**

b. Unknown. Investigation continues.

c, d. Unknown. Investigation continues.

e, f. Produced by the Ari-Zonolite Co. at its Phoenix, Arizona plant at least in 1964.

g, j. Chemical Composition: Chrysotile asbestos, Bentonite, Plaster of Paris, Perlite, Duponol, Elvalol. Approximately 41-46 percent asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.

l. The product was a white decorative textured finish for ceilings.

m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.

o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it has been conducting an investigation and document review for some time, which is continuing. Thus far, no information has been obtained which is responsive to this interrogatory.

28. a, n. **Zonolite Finishing Cement.**

b. Produced by the Zonolite Company from at least 1944 to 1952.

- c, d. Unknown. Investigation continues.
- e, f. Unknown. Investigation continues.
- g, j. Chemical Composition: 6D chrysotile asbestos, Bentonite, Plaster of Paris, Vermiculite, Gypsum Retarder. Approximately 21-26 percent asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical and Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.
 - l. Finish coat designed to be trowel applied over High Temperature Cement to give it a hard surface coating. High Temperature Cement and Finishing Cement were designed for application to interior, high temperature surfaces such as furnaces, boilers, heaters, and ovens.
 - m. Fireproofing and acoustical plastic products were packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it has been conducting an investigation and document review for some time, which is continuing. Thus far, no information has been obtained which is responsive to this interrogatory.
29. a, n. **Concrete Leveler or Block Filler.**
- b. Produced by Grace from the late 1960's.
 - c, d. Approximately mid-1970's.
 - e, f. This product was manufactured at one or both of the plants listed below. Approximate dates of manufacture are also listed.

- (1) Pompano Beach, Florida; 1971-1974.
- (2) Omaha, Nebraska; prior to 1971-1973.

g, j. Chemical Composition: Calcium Stearate, whiting, Celvatol, Daxad 17 or Tamol SN, Sodium Nitrite, Chrysotile Asbestos, Masonry Cement, Methocel, Nopco, and Perltes Texture Granules. Approximately 4% Chrysotile asbestos by weight.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

k. Commercial asbestos was purchased on a plant-by-plant basis. Grace has determined that the following were among the suppliers of commercial asbestos: Johns-Manville Corporation, National Gypsum Company, Carey-Canada Mines Limited, Pacific Asbestos Co., John K. Bice Co., A.J. Lynch & Co., Western Chemical Manufacturing, Thompson Hayward Chemical Company, Asbestos Corp. Ltd., Fitzgerald Company, The H.M. Royal Company, and Harrison & Crossfield.

l. Concrete Leveler or Block Filler was a gray cement-like product.

m. Sold in 25 lb. vapor-tight valve pack bags.

o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it has been conducting an investigation and document review for some time, which is continuing. Thus far, no information has been obtained which is responsive to this interrogatory.

30. a, n. **Bermuda Roof Aggregate.**

b. Believed to be manufactured by California Zonolite Company from 1963.

c. Approximately 1965.

d. Approximately 1965.

e, f. Believed to be manufactured at Los Angeles, California and Sacramento, California from 1963-1965.

g, j. Approximately six percent #1600 asbestos.

k. No information available.

l. No information available.

- m. No information available.
- o. No information available.
- 31. a, n. **Bermuda Roof Cement Paint. A variation from 1963 called Bermuda Roof Aggregate Paint had nearly the same percentage of commercial asbestos.**
 - b. Believed to be manufactured by California Zonolite Company in 1965.
 - c. Approximately 1965.
 - d. Approximately 1965.
 - e, f. Believed to be manufactured at Los Angeles, California and Sacramento, California in 1965.
 - g, j. 14.4 percent #1600 asbestos
 - k. No information available.
 - l. No information available.
 - m. No information available.
 - o. No information available.

ZONOLITE PRODUCTS WHICH DO NOT CONTAIN COMMERCIAL ASBESTOS

- 32. a, n. **Zonolite Mono-Kote MK-4.**
 - b. Limited amounts sold in 1970; early 1971, sold elsewhere.
 - c, d. MK-4 is not currently believed to be in regular production.
 - e, f. The product was manufactured at the plants listed below.
 - (1) Los Angeles, California
 - (2) Santa Ana, California
 - (3) Newark, California
 - (4) Phoenix, Arizona
 - (5) Trenton, New Jersey
 - (6) New Castle, Pennsylvania
 - (7) Omaha, Nebraska
 - (8) Muirkirk, Maryland
 - (9) Portland, Oregon

- (10) West Chicago, Illinois
- (11) Dallas, Texas
- (12) Easthampton, Massachusetts
- (13) Kearney, South Carolina
- (14) Irondale, Alabama
- (15) Wilder, Kentucky
- (16) Little Rock, Arkansas
- (17) Milwaukee, Wisconsin
- (18) Minneapolis, Minnesota
- (19) New Orleans, Louisiana
- (20) Dearborn, Michigan
- (21) Jacksonville, Florida
- (22) St. Louis, Missouri
- (23) Denver, Colorado

- g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because composition is a trade secret. Further answering, this product contains expanded vermiculite.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Not applicable.

- l. Cementitious beige fireproofing product.

- m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.

- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and the General Objections interposed above, Grace states that it holds the following patents for spray fireproofing products, registered through the U.S. Patent Office under which this product is manufactured:

3,719,513, patented March 6, 1973
3,839,059, patented October 1, 1974.

33. a, n. **Zonolite Mono-Kote MK-5.**

- b. First sold around November 1972.

c, d. This product has not been withdrawn from the market, but is not currently believed to be in regular production.

e, f. The product has been manufactured at some or all of the plants listed below.

- (1) Irondale, Alabama
- (2) Phoenix, Arizona
- (3) North Little Rock, Arkansas
- (4) Newark, California
- (5) Santa Ana, California
- (6) Denver, Colorado
- (7) Jacksonville, Florida
- (8) W. Chicago, Illinois
- (9) Wilder, Kentucky
- (10) Muirkirk, Maryland
- (11) Easthampton, Massachusetts
- (12) Dearborn, Michigan
- (13) Minneapolis, Minnesota
- (14) St. Louis, Missouri
- (15) Omaha, Nebraska
- (16) Trenton, New Jersey
- (17) Portland, Oregon
- (18) New Castle, Pennsylvania
- (19) Kearney, South Carolina
- (20) Dallas, Texas
- (21) New Orleans, Louisiana; ?-1989
- (22) Milwaukee, Wisconsin; ?-1991

g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the composition is a trade secret. Further answering, this product contains expanded vermiculite.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

k. Not applicable.

l. Cementitious beige fireproofing product.

m. This product is packaged in multi-walled, pasted-valve bags constructed of two pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.

- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to this objection, and the General Objections interposed above, Grace states that it holds the following patents for spray fireproofing products, registered through the U.S. Patent Office under which this product is manufactured.

3,719,513, patented March 6, 1973

3,839,059, patented October 1, 1974

34. a, n. **Plaster Aggregate.**

- b. 1942 by the Zonolite Company; 1963 by Grace.
- c, d. This product has not been withdrawn from the market.
- e, f. This product was manufactured at the plants listed below.
 - (1) Dallas Texas.
 - (2) San Antonio, Texas.
 - (3) North Little Rock, Arkansas.
 - (4) New Orleans, Louisiana.
 - (5) Nashville, Tennessee.
 - (6) Trenton, New Jersey.
 - (7) Weedsport, New York.
 - (8) Easthampton, Massachusetts.
 - (9) Kansas City, Missouri.
 - (10) New Castle, Pennsylvania.
 - (11) Dearborn, Michigan.
 - (12) Newark, California.
 - (13) Portland, Oregon.
 - (14) Phoenix, Arizona.
 - (15) Santa Ana, California.
 - (16) Kearney, South Carolina.
 - (17) Jacksonville, Florida.
 - (18) Pompano Beach, Florida.
 - (19) Tampa, Florida.
 - (20) High Point, North Carolina.
 - (21) Irondale, Alabama.
 - (22) West Chicago, Illinois.
 - (23) Omaha, Nebraska.
 - (24) Minneapolis, Minnesota.
 - (25) Wilder, Kentucky.
 - (26) Denver, Colorado.
 - (27) St. Louis, Missouri.

- g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the composition is a trade secret. Further answering, this product contains expanded vermiculite.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Not applicable.
- l. Beige.
- m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1. In early 1987, a change was made to poly-lined bags.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it is unaware of any patent for this product.
35. a, n. **Concrete Aggregate.**
- b. 1942.
- c, d. This product has not been withdrawn from the market.
- e, f. This product was manufactured at the plants listed below.
- (1) Dallas, Texas.
 - (2) San Antonio, Texas.
 - (3) North Little Rock, Arkansas.
 - (4) New Orleans, Louisiana.
 - (5) Nashville, Tennessee.
 - (6) Trenton, New Jersey.
 - (7) Weedsport, New York.
 - (8) Easthampton, Massachusetts.
 - (9) New Castle, Pennsylvania.
 - (10) Dearborn, Michigan.
 - (11) Newark, California.
 - (12) Portland, Oregon.
 - (13) Phoenix, Arizona.
 - (14) Santa Ana, California.
 - (15) Kearney, South Carolina.
 - (16) Jacksonville, Florida.

- (17) Pompano Beach, Florida.
- (18) Tampa, Florida.
- (19) Kansas City, Missouri.
- (20) High Point, North Carolina.
- (21) Irondale, Alabama, 1980 to present.
- (22) West Chicago, Illinois.
- (23) Omaha, Nebraska.
- (24) Minneapolis, Minnesota.
- (25) Wilder, Kentucky.
- (26) Denver, Colorado.
- (27) St. Louis, Missouri.
- (28) Los Angeles, California, 1975-6.
- (29) Milwaukee, Wisconsin.
- (30) Muirkirk, Maryland.
- (31) Oklahoma City, Oklahoma.
- (32) Traveler's Rest, South Carolina.

- g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the composition is a trade secret. Further answering, this product contains expanded vermiculite.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Not applicable.

- l. Tan expanded vermiculite.

- m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1. In early 1987, a change was made to poly-lined bags.

- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it is unaware of any patent for this product.

36. a, n. **Stabilized Concrete Aggregate.**

- b. Produced by Zonolite Company from some time no earlier than 1942.

- c, d. This product has not been withdrawn from the market.

e, f. Unless otherwise stated, this product was manufactured at the plants listed below from 1976 to the present. Investigation continues with regard to pre-1976 manufacture.

- (1) Dallas, Texas.
- (2) San Antonio, Texas; 1976-1989.
- (3) North Little Rock, Arkansas; 1976-1989.
- (4) New Orleans, Louisiana; 1976-1989.
- (5) Nashville, Tennessee; 1976-1989.
- (6) Trenton, New Jersey.
- (7) Weedsport, New York; 1975 to 1989.
- (8) Easthampton, Massachusetts.
- (9) New Castle, Pennsylvania.
- (10) Dearborn, Michigan.
- (11) Newark, California.
- (12) Portland, Oregon.
- (13) Phoenix, Arizona.
- (14) Santa Ana, California.
- (15) Kearney, South Carolina.
- (16) Jacksonville, Florida.
- (17) Pompano Beach, Florida.
- (18) Tampa, Florida.
- (19) High Point, North Carolina; 1976-1989.
- (20) Irondale, Alabama, 1980 to present.
- (21) West Chicago, Illinois.
- (22) Omaha, Nebraska; 1976-1989.
- (23) Minneapolis, Minnesota; 1976-1989.
- (24) Wilder, Kentucky.
- (25) Denver, Colorado.
- (26) St. Louis, Missouri.
- (27) Los Angeles, California.
- (28) Milwaukee, Wisconsin.
- (29) Muirkirk, Maryland.
- (30) Oklahoma City, Oklahoma.
- (31) Traveler's Rest, South Carolina.

g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the chemical composition is a trade secret. Further answering, this product contains expanded vermiculite and an air-entraining agent.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

k. Not applicable.

- l. Dark gray expanded vermiculite.
 - m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1. In early 1987, a change was made to poly-lined bags.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it is unaware of any patent for this product.
37. a, n. **Masonry Fill (also manufactured as Masonry Insulation).**
- b. 1958 or 1959.
 - c, d. This product has not been withdrawn from the market.
 - e, f. The product has been manufactured at the plants listed below.
 - (1) Dallas, Texas.
 - (2) San Antonio, Texas.
 - (3) Oklahoma City, Oklahoma.
 - (4) Little Rock, Arkansas.
 - (5) New Orleans, Louisiana.
 - (6) Nashville, Tennessee.
 - (7) Trenton, New Jersey.
 - (8) Weedsport, New York.
 - (9) Easthampton, Massachusetts.
 - (10) Muirkirk, Maryland.
 - (11) New Castle, Pennsylvania.
 - (12) Dearborn, Michigan.
 - (13) Newark, New Jersey.
 - (14) Portland, Oregon.
 - (15) Phoenix, Arizona.
 - (16) Santa Ana, California.
 - (17) Kearney, South Carolina.
 - (18) Jacksonville, Florida.
 - (19) Pompano Beach, Florida.
 - (20) Tampa, Florida.
 - (21) High Point, North Carolina.
 - (22) Irondale, Alabama.
 - (23) Chicago, Illinois.
 - (24) Omaha, Nebraska.
 - (25) Minneapolis, Minnesota.

- (26) Wilder, Kentucky.
- (27) Denver, Colorado.
- (28) St. Louis, Missouri.

- g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the chemical composition is a trade secret. Further answering, this product is a fill for concrete blocks which contains expanded vermiculite which is coated, among other reasons, to make the fill water repellant.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Not applicable.

- l. Dark gray vermiculite fill.

- m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1. In early 1987, change was made to poly-lined bags.

- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it is unaware of any patent for this product.

38. a, n. **Z-Crete.**

- b. Mid-1940's.

- c, d. Approximately 1959.

- e, f. Grace is unable to answer this interrogatory on the basis of its current knowledge.

- g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the chemical composition is a trade secret. Further answering, this product contained expanded vermiculite.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Not applicable.

- l. Dark grey expanded vermiculite.
 - m. This product was packaged in strong paper bags weighing 31 pounds each.
 - o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that the Zonolite company was licensed to manufacture this product under U.S. Patent 2,355,966.
39. a, n. **Top Crete.**
- b. November, 1980.
 - c, d. This product has not been withdrawn from the market.
 - e, f. The product has been approved for manufacture or manufactured at the plants listed below.
 - (1) West Chicago, Illinois
 - (2) Dallas, Texas
 - (3) Easthampton, Massachusetts
 - (4) Kearney, South Carolina
 - (5) Irondale, Alabama
 - (6) Newark, California
 - (7) Phoenix, Arizona
 - (8) Santa Ana, California
 - (9) Trenton, New Jersey
 - g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the chemical composition is a trade secret. Further answering, this product contains expanded vermiculite.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.
 - k. Not applicable.
 - l. Dull gray overcoat for Mono-Kote fireproofing.
 - m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1. In early 1987, a change was made to poly-lined bags.

- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it is unaware of any patent for this product.
40. a, n. **Top Crete 210.**
- b. July, 1981.
- c, d. June, 1983. Product was identical to Top Crete, and was replaced by Top Crete.
- e, f. The product has been approved for manufacture or manufactured at the plants listed below.
- (1) West Chicago, Illinois
- (2) Dallas, Texas
- (3) Easthampton, Massachusetts
- (4) Kearney, South Carolina
- (5) Newark, California
- g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the chemical composition is a trade secret. Further answering, this product contained expanded vermiculite.
- Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.
- k. Not applicable.
- l. Dull gray spray overcoat for Mono-Kote fireproofing.
- m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it is unaware of any patent for this product.

41. a, n. **Top Kote.**
- b. June, 1979.
- c, d. June, 1983.
- e, f. The product has been approved for manufacture or manufactured at the plants listed below.
- (1) West Chicago, Illinois
 - (2) Dallas, Texas
 - (3) Easthampton, Massachusetts
 - (4) Kearney, South Carolina
 - (5) Newark, California
 - (6) Portland, Oregon
 - (7) Trenton, New Jersey
- g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the chemical composition is a trade secret. Further answering, this product contained expanded vermiculite. Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.
- k. Not applicable.
- l. Dull gray overcoat.
- m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it is unaware of any patent for this product.
42. a, n. **Zonolite 105.**
- b. August, 1980.
- c, d. This product has not been withdrawn from the market.
- e, f. The product has been approved for manufacture at the plants below.

- (1) West Chicago, Illinois
- (2) Dallas, Texas
- (3) Easthampton, Massachusetts
- (4) Kearney, South Carolina
- (5) Irondale, Alabama
- (6) Muirkirk, Maryland
- (7) Newark, California
- (8) Phoenix, Arizona
- (9) Portland, Oregon
- (10) Santa Ana, California
- (11) Trenton, New Jersey
- (12) St. Louis, Missouri; ?-1990
- (13) Denver, Colorado; ?-1990

- g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the chemical composition is a trade secret. Further answering, this product contained expanded vermiculite.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Not applicable.

- l. Dull gray cementitious material.

- m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1. In early 1987, a change was made to poly-lined bags.

- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it is unaware of any patent for this product.

43. a, n. **Spatter Kote.**

- b. 1984.

- c, d. This product has not been withdrawn from the market.

- e, f. The product has been manufactured at some or all of the plants listed below. Where approximate dates of production are known, they are also listed.

- (1) Irondale, Alabama

- (2) Phoenix, Arizona
- (3) North Little Rock, Arkansas
- (4) Newark, California
- (5) Santa Ana, California
- (6) Denver, Colorado
- (7) Jacksonville, Florida
- (8) West Chicago, Illinois
- (9) Wilder, Kentucky
- (10) Muirkirk, Maryland
- (11) Easthampton, Massachusetts
- (12) Dearborn, Michigan; ?-1900
- (13) Minneapolis, Minnesota
- (14) St. Louis, Missouri; ?-1990
- (15) Omaha, Nebraska; ?-1989
- (16) Trenton, New Jersey
- (17) Portland, Oregon
- (18) New Castle, Pennsylvania
- (19) Kearney, South Carolina
- (20) Dallas, Texas

- g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the chemical composition is a trade secret. Further answering, this product contained expanded vermiculite.

Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.

- k. Not applicable.
- l. Dull gray cementitious material.
- m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1. In early 1987, a change was made to poly-lined bags.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it is unaware of any patent for this product.

44. a, n. **Zonolite 3300 Thermal Barrier.**

- b. April, 1975.

- c, d. This product has not been withdrawn from the market.
- e, f. The product has been approved for manufacture or manufacture at the plants listed below.
- (1) Dallas, Texas
 - (2) Trenton, New Jersey
 - (3) Chicago, Illinois
 - (4) Newark, California
 - (5) Portland, Oregon
 - (6) Phoenix, Arizona
 - (7) Santa Ana, California Jacksonville, Florida
 - (8) Easthampton, Massachusetts
 - (9) Kearney, South Carolina
 - (10) Irondale, Alabama
 - (11) Muirkirk, Maryland
 - (12) New Castle, Pennsylvania
 - (13) Minneapolis, Minnesota
 - (14) St. Louis, Missouri; ?-1990
 - (15) Denver, Colorado; ?-1990
- g, j. Chemical Composition: Grace objects to providing the chemical composition of this product because the chemical composition is a trade secret. Further answering, this product contained expanded vermiculite.
- Grace has not discovered any evidence of that the percentage of asbestos set forth above was changed. Grace recognizes that there may have been slight variations from plant to plant and year to year.
- k. Not applicable.
- l. Dull gray overcoat for polyurethane insulation.
- m. This product was packaged in multi-walled, pasted-valve bags constructed of two 60 pound plies of natural kraft paper, which is prescribed by the transportation industry, specifically, National Motor Freight Classification 100-1. In early 1987, a change was made to poly-lined bags.
- o. Grace objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection, Grace states that it is unaware of any patent for this product.

NON -ZONOLITE PRODUCTS WHICH CONTAIN COMMERCIAL ASBESTOS

45. a, n. **Horn Glazing Compound.**
- b. This was an A. C. Horn product. The product was first manufactured by Grace after it acquired the A.C. Horn Division of the Sun Company in 1962. Grace records of manufacturing authorization begin in 1966, as shown in the response to (e)-(f) below.
- c. 1970.
- d. Believed to be approximately 1970.
- e, f. The product was manufactured at some or all of the plants listed below. Where approximate dates of production based on records of manufacturing authorization are known, they are also listed.
- (1) Chicago, Illinois; 1966-1970
- (2) North Bergen, New Jersey; 1966-1970
- g. Approximately 4.8 percent.
- j. Fiber E Chrysotile asbestos fiber.
- k. No information available.
- l. No information available.
- m. No information available.
- o. No information available.
46. a, n. **Hornflex Sealants. Possibly also known as a. Hornflex-L, Hornflex L.S.A.-20 or Vertiseal, b. Hornflex 2C or Hornflex LP-32.**
- b. These were A.C. Horn products. Grace first manufactured these products after it acquired the A.C. Horn Division of the Sun Company in 1962. Grace records of manufacturing authorization begin in 1964 as shown in the response to (e)-(f) below.
- c. Approximately 1975.
- d. Believed to be approximately 1975.
- e, f. These products were manufactured at some or all of the plants listed below. Where approximate dates of production based on records of manufacturing authorization are known, they are also listed.

- (1) Chicago, Illinois; 1964-1975
- (2) North Bergen, New Jersey; 1964-1975
- (3) Houston, Texas; 1964-1972
- g. Approximately 0.4 to 1.01 percent asbestos.
- j. Fiber E Chrysotile asbestos fiber.
- k. No information available.
- l. No information available.
- m. No information available.
- o. No information available.
- 47. a, n. **Hornseal.**
 - b. This was an A.C. Horn product. Grace first manufactured this product after it acquired the A.C. Horn Division of the Sun Company in 1962. Grace records of manufacturing authorization begin in 1969, as shown in the response to (e)-(f) below.
 - c. Approximately 1975.
 - d. Believed to be approximately 1975.
 - e, f. The product was manufactured at some or all of the plants listed below. Where approximate dates of production based on records of manufacturing authorization are known, they are also listed.
 - (1) Chicago, Illinois; 1969-1975
 - (2) Houston, Texas; 1969-1974
 - g. The percentage of asbestos in this product varied according to the grade and color of the product and the type of asbestos fibers used. This product contained on average 1.9 percent asbestos.
 - j. The plants listed at (e) above may have used different asbestos types in their local production of the product. For this product the asbestos types may have included Fiber E Chrysotile asbestos fiber or Fiber E 7R05.
 - k. No information available.
 - l. No information available.

- m. No information available.
- o. No information available.
- 48. a, n. **Vulcatex Gun Grade and Professional Grade.**
 - b. These were an A.C. Horn products. Grace first manufactured these products after it acquired the A.C. Horn Division of the Sun Company in 1962. Grace records of manufacturing authorization begin in 1972, although there is information indicating earlier production, as shown in the response to (e)-(f) below.
 - c. 1977.
 - d. 1978.
 - e, f. (1) Gun Grade:
 - Chicago, Illinois; 1966 - 1977.
 - Houston, Texas; 1966-1977
 - North Bergen, New Jersey; 1966-1977.(2) Professional Grade:
 - Los Angeles, California; 1960-1977.
 - g. (1) Gun Grade: 15 percent
(2) Professional Grade: Approximately 28.08 percent asbestos (grey) and 30.35 percent asbestos (white) by weight.
 - j. 7D3 and 60X Chrysotile asbestos.
 - k. No information available.
 - l. No information available.
 - m. No information available.
 - o. No information available.

49.
 - a, n. **Waterproofing Compounds. Dehydratine Dampproofing products. Dehydratine 6 Mastic. Dehydratine 10 Semi-Mastic. No. 6 was also sold, until approximately 1969, as Dri-N-Tite Plastic. No. 10 was also sold, until approximately 1969, as Dri-N-Tite Liquid.**
 - b. These were an A. C. Horn products. Grace first manufactured these products after it acquired the A.C. Horn Division of the Sun Company in 1962. Grace records of manufacturing authorization begin in 1964, as shown in the response to (e)-(f) below.
 - c. 1977.
 - d. Believed to be approximately 1977.
 - e, f. These products were manufactured at some or all of the plants listed below. Where approximate dates of production based on records of manufacturing authorization are known, they are also listed.
 - (1) Chicago, Illinois; 1964-1974
 - (2) North Bergen, New Jersey; 1975-1977 (No. 6)
1964 - 1977 (No. 10)
 - g. Approximately 15-20 percent asbestos (No. 6); approximately 12-14 percent asbestos (No. 10).
 - j. Fiber E Chrysotile asbestos fiber, Type 7RS Chrysotile fiber.
 - k. No information available.
 - l. No information available.
 - m. No information available.
 - o. No information available.
50.
 - a, n. **Epoxy Liquid Bonding Agent. Epoxitite B. Expoxitite Binder or Weld, Epoxitite 2343.**
 - b. This was an A. C. Horn product. Grace first manufactured this product after it acquired the A.C. Horn Division of the Sun Company in 1962. Grace records of manufacturing authorization begin in 1964, although there is information indicating earlier production, as shown in the response to (e)-(f) below.
 - c. 1975.
 - d. Believed to be approximately 1975.

- e, f. The product was manufactured at some or all of the plants listed below. Where information on approximate dates of production has been obtained, they are also listed.
 - (1) Chicago, Illinois; 1969-1975
 - (2) North Bergen, New Jersey; 1969-1975
 - (3) Houston, Texas; 1960-1975
 - (4) Los Angeles, California; 1960-1975
 - g. Approximately 0.5 to 0.8 percent asbestos by weight.
 - j. The plants listed at (e) above may have used different asbestos types in their local production of the product. For this product the asbestos types may have included Fiber E Chrysotile asbestos fiber, Asbestos 60X, or Carey D, 7D3.
 - k. No information available.
 - l. No information available.
 - m. No information available.
 - o. No information available.
51. a, n. **Epoxy Base Adhesive. Thiopoxy 62, later renamed Epoxitite 2362 Adhesive Base.**
- b. This was an A. C. Horn product. Grace first manufactured this product after it acquired the A.C. Horn Division of the Sun Company in 1962. Grace records of manufacturing authorization begin in 1964, although there is information indicating earlier production, as shown in the response to (e)-(f) below.
 - c. 1975.
 - d. Believed to be approximately 1975.
 - e, f. The product was manufactured at some or all of the plants listed below. Where information on approximate dates of production has been obtained, they are also listed.
 - (1) Chicago, Illinois; 1969-1975
 - (2) North Bergen, New Jersey; 1969-1975
 - (3) Houston, Texas; 1960-1975
 - (4) Los Angeles, California; 1960-1975

- g. This product contained approximately 2.7 percent mineral fillers, of which 25% was Johns-Manville 7R05 Chrysotile asbestos and 75% was commercial calcium carbonate. The percentage of asbestos in the finished product would be approximately 0.8 percent by weight.
 - j. Johns-Manville 7R05 Chrysotile asbestos.
 - k. No information available.
 - l. No information available.
 - m. No information available.
 - o. No information available.
52. a, n. **Epoxy Resin Floor Surfacing. Thiopoxy Deck-Tread System.**
- b. This was an A. C. Horn product. Grace first manufactured this product after it acquired the A.C. Horn Division of the Sun Company in 1962. Grace records of manufacturing authorization begin in 1966, although there is information indicating earlier production, as shown in the response to (e)-(f) below.
 - c. Believed to be 1966.
 - d. Believed to be no later than 1971.
 - e, f. The product was manufactured at the plant listed below. Where information concerning approximate dates of production has been obtained, they are also listed.

Los Angeles, California; 1960-1966.
 - g. This product contained approximately 2.8 percent mineral fillers, of which 25% was Johns-Manville 7R05 Chrysotile asbestos and 75% was commercial calcium carbonate. The percentage of asbestos in the finished product would be approximately 0.8 percent by weight.
 - j. Johns-Manville 7R05 Chrysotile asbestos.
 - k. No information available.
 - l. No information available.
 - m. No information available.
 - o. No information available.

53. a, n. **Slip Resistant Coating. Treadsure.**
- b. This was an A. C. Horn product. Grace first manufactured this product after it acquired the A.C. Horn Division of the Sun Company in 1962. Grace records of manufacturing authorization begin in 1966, as shown in the response to (e)-(f) below.
- c. 1978.
- d. 1978.
- e, f. The product was manufactured at some or all of the plants listed below. Where approximate dates of production based on information obtained to date are known, they are also listed.
- (1) Chicago, Illinois; prior to 1966
- (2) North Bergen, New Jersey; 1967-1978
- (3) Houston, Texas; 1966-1978
- (4) Los Angeles, California; 1967-1977
- g. The percentage of asbestos in this product varied according to the grade and color of the product and the type of asbestos fibers used. Approximately 4.5 percent to 9 percent asbestos. A gray version contained approximately 1.0 percent.
- j. The plants listed at (e) above may have used different asbestos types in their local production of the product. For this product the asbestos types may have included Fiber E Chrysotile asbestos fiber, 7D3 asbestos and Fiber E 7R05.
- k. No information available.
- l. No information available.
- m. No information available.
- o. No information available.
54. a, n. **EXTERIOR MASONRY COATING. Vulcaflex Exterior Masonry Coating.**
- b. This was an A. C. Horn product. Grace first manufactured this product after it acquired the A.C. Horn Division of the Sun Company in 1962. Grace records of manufacturing authorization begin in 1966, although there is information indicating earlier production, as shown in the response to (e)-(f) below.
- c. 1972.

- d. Believed to be 1972.
 - e, f. The product was manufactured at the plant listed below. Where information concerning approximate dates of production has been obtained, they are also listed.

Los Angeles, California; 1960-1972.
 - g. Percentage of asbestos varied from 11.4-16.7 percent.
 - j. The plants listed at (e) above may have used different asbestos types in their local production of the product. For this product the asbestos types may have included Chrysotile asbestos fiber and 7D3 asbestos.
 - k. No information available.
 - l. No information available.
 - m. No information available.
 - o. No information available.
55. a, n. **Concrete Joint Sealing Compound. Zero-Lastic.**
- b. This was a Servicised product. Grace first manufactured this product after it acquired the Servicised Products Corporation in 1964. Grace records of manufacturing authorization begin in 1965, as shown in the response to (e)-(f) below.
 - c. Approximately 1975.
 - d. Believed to be approximately 1975.
 - e, f. The product was manufactured at the plant listed below. Where approximate dates of production based on records of manufacturing authorization, are known, they are also listed.

Chicago, Illinois; 1965-1975
 - g. Approximately 8.7 percent asbestos before 1973 and 2.7 percent asbestos after 1973 until 1975.
 - j. 7RF asbestos.
 - k. No information available.
 - l. No information available.
 - m. No information available.

- o. No information available.
- 56. a, n. **ADHESIVE WATER BARRIER COATING. Believed to be called Bituthene Plastic 85. Possibly also known as Bituplastic 85.**
 - b. Grace first produced this product after December, 1970.
 - c. Last production is believed to have been in 1972.
 - d. Grace believes that this product was last sold in 1972.
 - e, f. The product was manufactured at a plant located in Chicago, Illinois from 1970 until 1972.
 - g. 2.8 percent asbestos by weight.
 - j. 7RF asbestos, 7TS asbestos.
 - k. No information available.
 - l. No information available.
 - m. No information available.
 - o. No information available.
- 57. a, n. **Waterproofing Sealant. Bituthene Mastic.**
 - b. Grace first produced this product after February, 1969.
 - c. Approximately 1975.
 - d. Approximately 1975.
 - e, f. This product was manufactured at a plant located in Chicago, Illinois from 1969 until 1975.
 - g. 2.7 percent asbestos by weight.
 - j. 7RF asbestos.
 - k. No information available.
 - l. No information available.
 - m. No information available.
 - o. No information available.